



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
COLUMBIA ENVIRONMENTAL FIELD OFFICE

1421 HAMPSHIRE PIKE
COLUMBIA, TENNESSEE 38401
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January 20, 2016

Mr. Solomon Miller, Chief Manager-Administration
Tennessee Valley Recycling, LLC
P.O. Box 387
Pulaski, TN 38478

Re: Compliance Evaluation Inspection
Tennessee Valley Recycling, LLC
NPDES Permit No. TN0080063
Pulaski, Giles County, Tennessee

Dear Mr. Miller:

On December 22, 2015, I conducted a Compliance Evaluation Inspection (CEI) of the storm water treatment system at the Tennessee Valley Recycling, LLC facility in Pulaski, TN. A CEI is conducted to determine compliance with the permit and to review the operation and maintenance of the treatment system. The following comments are for your consideration:

1. The current permit became effective on April 1, 2013 and shall expire on December 31, 2017.
2. This permit authorizes the discharge of treated storm water runoff from Outfall 001 to Richland Creek.
3. The following modifications have been made to the operating area since the previous inspection: (a) Tennessee Valley Recycling, LLC (TVR) has installed concrete paving on the majority of the operating area which drains to the storm water detention pond for solids removal and effluent filtration. (b) A storm water treatment system for the effluent sedimentation pond, consisting of pumps, controls, cartridge filters and Polychlorinated biphenyls (PCBs) removal filters was completed in the spring of 2014.
4. TVR has conducted additional monitoring for total PCBs in the mixing zone downstream of Outfall 001. This monitoring was performed during the fall of 2014 on a one-time basis to assess whether the waters of Richland Creek are affected by PCB sources, including current and past discharges from TVR. PCBs are lipophilic, or lipid-seeking which means they tend to associate with suspended organic particles and fatty tissues in organisms. For this reason, they tend to not be concentrated in water and are often not detectable in water samples using common analytical methods.

5. The study was conducted by employing instream monitors to assess bioaccumulation, known as SPMDs, or Semi-Permeable Membrane Devices. SPMDs are plastic sleeves filled with a lipid (fat) which serves as a collector for lipid-soluble substances such as PCBs. The SPMDs have a 4 week deployment period which allows them to detect chronic low levels of dissolved PCBs in stream water and outfall effluents. The division recognized that the SPMD's produce semi-quantitative results for dissolved PCBs only and do not characterize particulate bound PCBs. However, the study conducted focused on the potential for an ongoing source of PCBs to exist in the proximity of the TVR Outfall 001. The SPMDs were installed in the following locations:

SPMD #1- upstream at Hwy 64 overpass

SPMD #2- in Outfall 001 mixing zone

SPMD #3- in downstream mixing zone near Old Pulaski Bridge

Upon reviewing the stream study data and report submitted in May 2015, the division appreciates the effort that TVR and its consultant applied toward the study with the primary focus continuing to be the effluent data that TVR is providing, showing that PCB concentrations in the treated effluent discharge remain below detectable limits.

6. The monitoring frequency has been reduced from monthly to quarterly monitoring for Total Suspended Solids (TSS) and Polychlorinated Biphenyls (PCBs). Consent Order WPC12-0130 required temporary monthly monitoring of TSS and PCBs for two years or until 6 consecutive months of samples were in compliance with the permit limit. The sampling frequency was reduced starting with the April-June 2015 quarter.
7. The Storm Water Pollution Plan (SWPPP) has been developed and is being maintained pursuant to the requirements set forth in the Tennessee Multi-Sector General Permit for Industrial Activities, Sector N. The SWPPP has been reviewed and updated during the 2015 calendar year.
8. The annual report of detention pond maintenance for 2015 has not been submitted. It was discussed during the inspection and the report should be submitted in the spring of 2016. There have been scheduling conflicts with the cleaning of the pond as to the delay for submitting the report.

This concludes my inspection. I would like to thank Mr. Stewart Miller and Mr. Tant for their time and cooperation during the inspection. If you have any questions you may reach me at 1-931-840-4166 or by e-mail at gary.horne@tn.gov.

Sincerely,



Gary Horne
Division of Water Resources



ICIS NPDES Facilities Inspection Report

Facility Data

NPDES ID:	TN0080063	Facility Site Name	Tennessee Valley Recycling		
		Address	P.O. Box 387 Pulaski, TN 38478		
Permit Eff. Date:	Apr 1, 2013	Permit Exp Date:	Dec 31, 2017	SIC Code:	

Compliance Monitoring Information

Compliance Monitoring Activity Name	Compliance Evaluation (non-sampling) (CEI)				
	* If Bio Monitoring is selected above, select the method used:				
Compliance Monitoring Activity	Evaluation				

Compliance Monitoring Dates/Times

Entry Date/Time (mm/dd/yyyy hh:mm):	12/22/2015 9:30	Exit Date/Time (mm/dd/yyyy hh:mm):	12/22/2015 11:00
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Facility Representatives

Mr. Stewart Miller, General Manager, 931-363-3593	Mr. Solomon Miller, Chief Manager, 256-353-6351
On-Site Representative(s) Title, Phone Number	Responsible Official(s), Title, Phone Number

Statute and Section Information

Federal Statute:	CWA - Clean Water Act	State Statute:	Tennessee Water Quality Control Act		
Programs:	NPDES- Base Program (Limits, Reporting, & Schedule)				
Compliance Monitoring Reason:	Core Program				
Compliance Monitoring Agency Type:	State	Agency Name:	TDEC - DWR		
Did EPA assist/ Inspection?	No	Time Physically conducting activity: Days:		Hours:	2
Inspection Type:	State	Compliance Monitoring Action Outcome:	No Violation		
Lead Agency:	State	Compliance Monitoring Rating Code:	Unrated		
If Joint Inspection, what was the purpose of the other party?					

Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Self - Compliance Program	<input type="checkbox"/> Pretreatment
<input checked="" type="checkbox"/> Records / Records	<input type="checkbox"/> Compliance Schedule	<input checked="" type="checkbox"/> Pollution Prevention
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water
<input checked="" type="checkbox"/> Effluent / Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow
<input checked="" type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Sludge Handling / Disposal	<input type="checkbox"/> Sanitary Sewer Overflow

Compliance Monitoring Summary

EPA and State Representatives

	TDEC-DWR/ Columbia EFO/ 931-840-4166	1/20/16
Inspector's Signature	Agency / Office / Phone	Date
	TDEC-DWR/ Columbia EFO/ 931-840-4153	1/20/16
Manager's Signature	Agency / Office / Phone	Date

(Note: This form can only be printed to an XPS document, then saved for later use.)